## KEENAN & BHATIA, LLC

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## BY CM/ECF

October 14, 2024

The Honorable Dale E. Ho United States District Judge Southern District of New York Application GRANTED. Discovery is stayed pending further order of the Court. The parties shall submit a joint status letter no later than November 14, 2024. The conference previously scheduled for January 21, 2025 is adjourned sine die. The Clerk of Court is respectfully requested to terminate ECF No. 26.

SO ORDERED.

Dale E. Ho

**United States District Judge** Hair v. Hampton Mgmt. Co., LLC, et al., No. 1:23-cv-06421-DEH Dated: October 15, 2024

New York, New York

Dear Judge Ho:

RE:

The undersigned counsel represents Victoria Hair, the Plaintiff in the above-captioned employment case. With Defendants' consent, we write to request a stay of discovery, with status letters to be filed every 30 days.

As the Court may recall, Ms. Hair's father has been seriously ill for some time, and Ms. Hair has been with him around the clock as his only familial support. On August 29, when we last wrote to the Court on this topic, ECF Dkt. No. 24, Mr. Hair was not expected to live more than a few weeks. However, he remains alive as of this writing, and is now undergoing a series of inpatient procedures with Ms. Hair by his side. His prognosis is unclear at this time.

The foregoing circumstances have also inspired a renewed interest in settlement, and the parties are therefore working in tandem to determine whether the case can be resolved without further litigation. To that end, and due to Mr. Hair's tenuous medical condition, we respectfully ask the Court to stay discovery in this matter, with status letters to be filed by the parties every 30 days for the Court's review. Counsel for the parties have discussed this request and Defendants have stated they have no objection.

We thank the Court in advance for its time and consideration.

Request for Stay of Discovery

Dated: October 14, 2024 Respectfully submitted,

**KEENAN & BHATIA, LLC** 

Chloe Liederman Attorney for Plaintiff